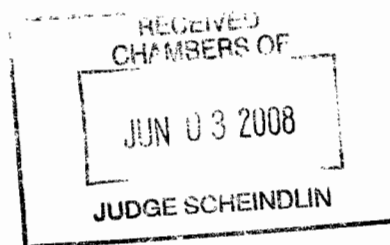
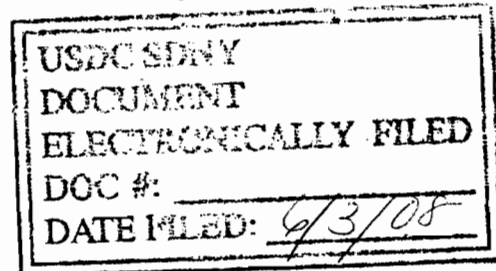


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June 2, 2008



By Fax only: 212-805-7920
Honorable Shira Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007

Re: United States v. Abel Gonzalez-Casillas, et al., S1 07 Cr. 527 (SAS)
Defendant Represented: Luis Ramirez

Dear Judge Scheindlin:

I represent Luis Ramirez in connection with the referenced matter. I respectfully submit this letter seeking an adjournment of this matter that is scheduled for trial on June 23, 2008.

Mr. Ramirez and his codefendants are charged in the indictment with participating in a narcotics conspiracy involving the distribution of large amounts of narcotics. The case involves voluminous discovery, and the promise of the production of substantial evidence at trial, including audio recordings obtained in connection with eavesdropping warrants. The charges contained in the indictment carry extremely serious potential sentences. With respect to one of Mr. Ramirez's two codefendants, I am informed that a plea proceeding is scheduled for June 3, 2008 for codefendant Gonzalez-Casillas.

We have been engaged in serious plea discussions with the government. The discussions are continuing and we have scheduled a meeting this week to further pursue those discussions. Given the seriousness of the charges and potential sentences the plea negotiations require additional time. I respectfully submit that if additional time is available for the parties to pursue plea discussions there exists a reasonable likelihood the matter can be resolved without a trial.

Request denied. The trial will begin on June 25, 2008. So ordered: [Signature] 6/3/08

Law Office of Robert J. Krakow, P.C.

Hon. Shira Scheindlin
June 2, 2008
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We respectfully request that the trial date be adjourned for a period of 30 days to allow the parties time to reach a disposition on this extremely serious case.

Accordingly, it is respectfully requested that this matter be adjourned for a period of 30 days from the currently scheduled trial date of June 23, 2008 to a date that is convenient for the court and the parties.

Respectfully submitted,



Robert J. Krakow

cc: By Fax (212)637-2390
AUSA Eugene Ingoglia

Jonathan Marks, Esq.
Counsel for Defendant Abel Gonzalez-Casillas

Lawrence Feitell, Esq.
Counsel for defendant Israel Torres